

From: Sierra Landholm <sierra@freemanlawfirm.org>
Sent: Friday, March 5, 2021 3:17 PM
To: WAWDdb_NewCasesTac
Cc: Spencer Freeman
Subject: Request for Issuance of DMCA Subpoena to Namecheap, Inc.
Attachments: Ltr to Ct Clerk re DMCA Subpoena.pdf; Prop'd DMCA SDT Namecheap, Inc..pdf; Dec ISO DMCA SDT to NAMECHEAP (Final)_Signed.pdf

CAUTION - EXTERNAL:

TO: Clerk of the United States District Court, Western District of Washington

This office represents MG Premium Ltd ("MG") in its request for issuance of a Subpoena to service provider Namecheap, Inc.. ("Namecheap") pursuant to U.S.C. § 512(h) ("DMCA Subpoena"). The DMCA Subpoena requests the identification of infringers of MG's copyrighted material posted on "[camwhores.tv](#); [daftsex.com](#); [fembed.com](#); [ff-01.com](#); [ff-03.com](#); [incestflix.com](#); [javdoe.tv](#); [noodlemagazine.com](#); [porndish.com](#); [porneq.com](#); [pornrips.com](#); [pornve.com](#); [pornxp.com](#); [veporn.com](#); [xmoviesforyou.net](#); and [yespornpleas.io](#)."

To this end, the following documents are attached pursuant to the statute's requirements to enable the Clerk to issue such Subpoena:

- Letter requesting the Clerk's issuance of the DMCA Subpoena;
- Proposed DMCA Subpoena to Cloudflare, Inc.; and,
- Sworn Declaration of Andreas Alkiviades Andreou in support of the DMCA Subpoena.

Copies of the notifications issued under 17 U.S.C. § 512(c)(3)(A) to the DMCA Agent for Cloudflare are attached to both the Subpoena and Declaration. We believe the materials submitted herewith will enable you to issue the requested DMCA Subpoena.

We will pay the filing fee on ECF.

Thank you in advance for your assistance in this matter.

Cordially,

Sierra Landholm

Paralegal

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